

EXHIBIT N

IN THE UNITED STATES DISTRICT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA

MARNIE O'BRIEN :

Plaintiff : Civil Action

vs. : No. 2:19-cv-06078-JMG

MIDDLE EASTERN FORUM,
DANIEL PIPES (individually),
and
GREGG ROMAN (individually)

Defendants :

GREGG ROMAN :

Counterclaim and Third-Party Plaintiff :

vs. :

MARNIE O'BRIEN, :

Counterclaim Defendant, :

DECLARATION OF MARNIE O'BRIEN

Under 28 U.S.C.A. §1746

I, Marnie O'Brien, hereby declare that the following statements are based on personal knowledge and are true and correct to the best of my knowledge, information, and belief:

1. I am an adult female individual with a place of residence in the State of New Jersey.
2. I am a professional bookkeeper and real estate agent.
3. I am fifty-one (51) years of age.

4. I worked for Middle East Forum from 2016 through March of 2020.

5. During this time I worked as the Controller.

6. Throughout the course of my employment with Middle East Forum I was subjected to sexual harassment by the Director, Gregg Roman, as well as the subject of several rumors. I included several examples of the harassment in my filed Complaint, however I was not asked many questions about the behaviors at my deposition.

7. The behavior I was subjected to by Gregg Roman in terms of the inappropriate commentary and leering was ongoing. Specifically, Roman would leer at almost all of the women who worked for the Forum, myself included. He would stare at our legs, our breasts and our buttocks. On one instance, Roman came into my office and stared at my gym bag. I thought it was odd, but when he left I noticed my undergarments were showing. These types of behavior with Roman occurred all of the time.

8. If we were working on a project or document together, Roman would insist we go into his office and sit unnaturally close to him to look at his computer screen. This happened with great frequency.

9. Roman incessantly discussed his own sex life in the office and asked about my sex and dating life on a frequent basis. He did this to other women working for the Middle East Forum as well.

10. From time to time donors would visit our office. Roman insisted I entertain a male donor who had attempted to be flirtatious with me in the office.

11. There were also the major issues I discussed in my complaint and at my deposition.

12. In addition to these incidents of sexual harassment, Gregg Roman intentionally pitted myself and my female co-workers against each other so that we would not collectively discuss his behaviors. He did not interfere with the relationships between male staff members in the same manner.

13. Gregg Roman fostered an environment of mistrust and insisted all communications from female staff members be filtered through him.

14. This included communications with Dr. Pipes. He would become apoplectic if he heard that a female staff member communicated with Dr. Pipes without his knowledge or approval.

15. Roman used to tell all female staff, including myself, he could hack into any device, from anywhere.

16. Roman also told the female staff he had access to all of our communications.

17. Roman had surveillance cameras set up all over the office and facing his office. He used to allude to additional cameras which made us all paranoid he was watching our every move. Further, he also used to comment on the frequency with which a former employee who suffered a medical condition used the bathroom. He knew when she used the bathroom even when he was not in the office. Sometimes he would call one staff member and ask them to report on where specifically in the office everyone was and what they were doing. The female staff was effectively asked to spy on one another. We all felt as though we were being watched at all times.

18. I did not initially raise complaints to Dr. Pipes because I was terrified of those complaints being intercepted by Roman. He could see what we did on the cameras. He could access our devices and accounts. He policed our communications with Dr. Pipes.

19. Further, as human resources, I had a unique view of exactly what happened to the female employees who crossed Gregg Roman.

20. Tiffany Lee complained about Gregg Roman's behavior and was fired.

21. Laura Frank complained about Gregg Roman's behavior and was fired.

22. Lara Szott complained about Gregg Roman's behavior and was fired.

23. Iman Patel raised a myriad of complaints about Gregg Roman's behavior. Roman and Dr. Pipes referred to her as a walking lawsuit and intentionally made her work life hell so she would leave voluntarily. Ultimately, she could not take the pressure and left to work in a different field entirely.

24. These are just the women I personally saw try to challenge Gregg Roman while I worked at the Middle East Forum. There are many other stories that have been told to me about what he does to women who stand up for themselves. Given that all of the I personally knew of women were terminated or forced out, I was terrified to complain and lose my job, or worse.

25. When Lisa Barbounis told me Gregg Roman had instructed her to file complaints against me, and then broke down about his behavior in Israel- that she had been so scared of him she slept with a knife under her pillow, I knew we had to be brave and report. We were terrified of Roman intercepting the complaint before we could get it to Dr. Pipes. I had to figure out how to get the complaint to Dr. Pipes without Roman finding out about it first. I told Lisa to ignore me for the day. I expressed my fears of being fired and going broke. Ultimately, I was so scared I hand-wrote the complaint and sent it to Dr. Pipes personal account, hoping that Roman would not catch it. I was terrified to tell Dr. Pipes of Roman's sexual harassment not only of me, but of Lisa, even though escalating Lisa's report of sexual harassment was my job.

26. After I presented the complaint to Dr. Pipes he came to the office to speak with the staff. He spent five to ten minutes with each of us and as far as I know that was the extent of his investigation. It was concluded in less than half a business day. He proceeded to have a meeting in front of everyone about all of these incredibly sensitive complaints. Roman's sister was invited to the meeting. After that, he made it very clear to everyone that he felt his job was done and we should be putting the matter behind us.

27. After we filed our report and Roman was initially removed from the office I was hopeful things would get better. However the animosity Roman had built between the staff and me continued. Lisa gossiped about my sex and dating life with Matt Bennett. Even still, it was marginally better with Roman gone.

28. In March 2019, Dr. Pipes decided to give Roman a second chance. I continued to voice my objections, but I was overruled.

29. In November 2018, I was promised that I would not have to work with Roman again and that he would no longer have access to my work product. Now, just a few months later, he was being brought back into the office to discuss how he could resume many of his prior responsibilities.

30. Within weeks of this meeting, in April 2019, rumors that I had slept with Caitriona Brady's father were circulated. I reported them to Dr. Pipes.

31. Dr. Pipes stated that he was told that a few people had heard these rumors before November 2018 so he was not going to investigate them. I was deeply upset. First of all, I had never heard these rumors before and further, even if they had been mentioned before, they were

being brought up again! It should not have been permitted, and anyone spreading the rumor should have been reprimanded at the very least, but Dr. Pipes allowed it to continue.

32. After this occurred Dr. Pipes ordered me to work on an audit with Roman. Roman was not essential to the audit, and I objected. I brought up that I was promised he would not have access to my work product and that I should not have to continue to work with him. He had harassed me, had every reason in the world to retaliate against me for reporting him, and part of the remedy was that I would not have to work with him or give him access to my work product any longer. This was only honored for a few months. Even though I raised these complaints, I was ignored and told that I had to work with him anyway.

33. I know that I was not the only female staffer to complaint about Roman after his return. Nevertheless, he was permitted to remain in his position, and continued to gain power and authority within the organization. It was as if the reports we had made did not matter or worse, had never happened.

34. Defendants have argued that I have left the labor force. The same could not be further from the truth. It is true that I am terrified to be put in another situation like what I faced working for Middle East Forum. However, I have continued to seek employment. I have children that I am financially responsible for as well as having my own expenses. I have applied for jobs, attempted to further develop my consulting firm which previously had been only a side job, and have attempted to get work using my real estate license, although I admittedly have very little experience in that field. The fact remains that small businesses, the type that might need book keepers either as consultants or full time, are not doing well right now and are trying to make due with what they have if they are able to keep going at all. The argument that I left the labor force

when as recently as last week I was participating in an interview is completely inaccurate and is taking my statements at my deposition out of context.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

February 11, 2021.



Marnie O'Brien